

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

KELLY BUTLER, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

ADIENT US LLC,

Defendant.

JUDGE JEFFREY J. HELMICK

CASE NO.: 3: 20-CV-02365-JJH

MOTION FOR EXTENSION TO FILE RESPONSIVE PLEADING

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendant Adient US LLC (“Adient”) files this Motion for Extension of Time to File Responsive Pleading to Plaintiff’s Complaint, which seeks a fifteen-day extension of time up to and including December 15, 2020, to file an Answer or otherwise respond to the Complaint. The grounds for the Motion are as follows:

1. On October 16, 2020, Plaintiff filed a Complaint against Adient. (Dkt. No. 1).
2. On November 19, 2020, this Court granted an unopposed motion filed by Adient for a two-week extension to file the responsive pleading. Accordingly, Adient’s responsive pleading is currently due on November 30, 2020. (Dkt. No. 5).
3. The parties have since engaged in preliminary discussions regarding the viability of the claims alleged in the Complaint, in particular due to the existence of a collective bargaining agreement that may have been unknown to Plaintiff’s counsel before filing the Complaint.
4. Counsel for Adient is currently awaiting a response from Plaintiff’s counsel regarding the impact of the collective bargaining agreement on this lawsuit, and Adient may

pursue a motion to dismiss the claims in the Complaint depending on Plaintiff's position and the parties' continued discussions.

5. Counsel for Adient respectfully requests additional time for the parties to confer and potentially prepare a motion to dismiss following the upcoming holiday.

6. This request is not presented for delay. No party will be prejudiced by granting this extension.

WHEREFORE, Defendant Adient US LLC respectfully requests an extension of time up to and including December 15, 2020, to file its response to Plaintiff's Complaint.

/s/ John B. Lewis

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**Attorneys for Defendant
Adient US LLC**

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of November 2020, the foregoing was filed electronically with the Clerk of Court and served via the Court's Electronic Filing System upon all counsel of record.

/s/ John B. Lewis

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